

EXHIBIT 4'



Debevoise & Plimpton LLP
66 Hudson Boulevard
New York, NY 10001
+1 212 909 6000

August 25, 2023

BY EMAIL

Philippe Z. Selendy
SELENDY GAY ELSBERG PLLC
1290 Sixth Avenue
New York, NY 10104
pselendy@selendygay.com

Todd M. Schneider
SCHNEIDER WALLACE
COTTRELL KONECKY LLP
2000 Powell Street
Emeryville, CA 94608
tschneider@schneiderwallace.com

Re: In re Tether and Bitfinex Crypto Asset Litig., No. 19 Civ. 9236 (KPF) (S.D.N.Y.)

Dear Counsel:

We write on behalf of the B/T Defendants¹ to follow up on several open items in connection with the upcoming depositions.

First, Plaintiffs have yet to respond to the B/T Defendants' August 18 letter regarding Plaintiffs' proposed topics for the Bitfinex Defendants' Rule 30(b)(6) deposition. We urgently need clarity on those topics in order to ensure that the Bitfinex Defendants' first designee (Paolo Ardoino) is adequately prepared. His deposition is scheduled for just over two weeks from today, and it would be extremely difficult to find a later date in light of his busy schedule. Please get back to us as soon as possible, and no later than 12:00pm EST on Monday, as the B/T Defendants may need to seek the Court's intervention if the parties are unable to reach an agreement.

Second, Plaintiffs still have not noticed a Rule 30(b)(6) deposition of any of the Tether Defendants, despite saying in a July 24 letter that they "intend to serve a 30(b)(6) notice to Tether soon," and despite the B/T Defendants' follow-up on Monday. Please provide any notice that Plaintiffs intend to serve on the Tether Defendants by Wednesday, August 30, in order to

¹ Capitalized terms have the meaning set out in the B/T Defendants' July 31, 2023 letter regarding the Revised Notice.

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permit sufficient time for the parties to negotiate the topics and seek the Court's intervention if needed, and for the Tether Defendants to identify and adequately prepare their designee(s).

Third, insofar as Plaintiffs intend to notice or schedule any additional depositions, please let us know so that we can lock in dates as soon as possible. The B/T Defendants note that it will be extremely difficult to schedule any depositions for their witnesses between October 13 and 23, due to an international conference.

Fourth, the B/T Defendants understand that Mr. Script is not available to sit for his deposition on September 15. The B/T Defendants propose September 20 for Mr. Script's deposition. If that date does not work, we ask that Plaintiffs please provide alternatives.

Best regards,

/s/ Natascha Born